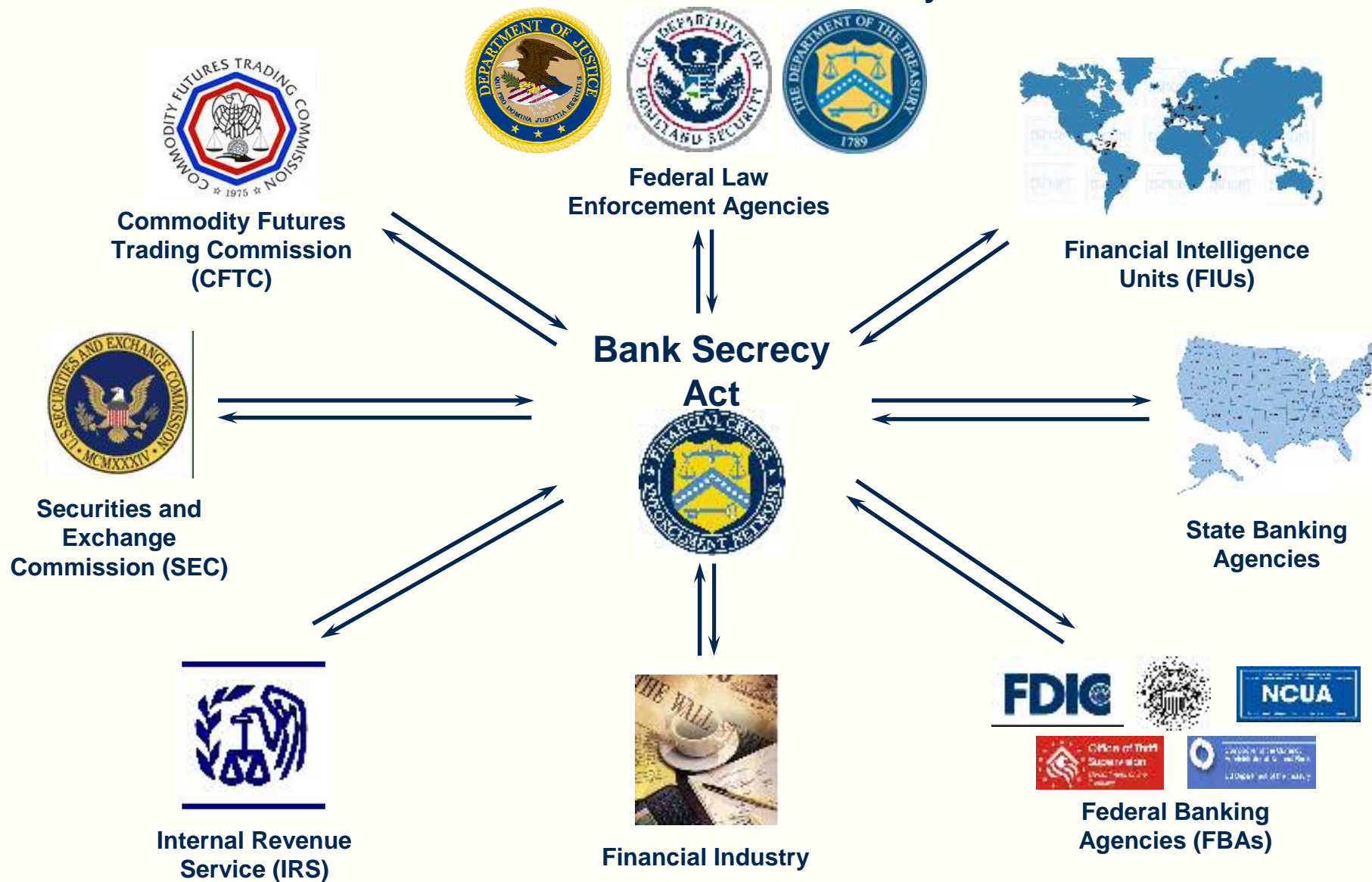


# BSA: A Year in Review and Setting the Table for 2007

# Financial Crimes Enforcement Network

## Administrator of the Bank Secrecy Act



# *NCUA BSA Compliance Exam Program*

- NCUA's BSA Compliance Review
- Examination Tools
  - AIRE Questionnaire
  - FFIEC BSA/AML Examination Manual
- Examiner Training
- Subject Matter Examiners
- Information Exchange with Regions

# *2006 FFIEC BSA/AML Exam Manual*

- Reorganized/Restructured for Clarity and Ease of Use
- ACH Section Added
- Trade Finance Issues Addressed
- Finalized Regulations or Guidance Added
- Risk Assessment Section Added
- Available for download at [www.ffiec.gov/guides.htm](http://www.ffiec.gov/guides.htm)

# *Risk Assessment*

- Used to Structure BSA/AML Compliance Program
- Two Step Process
  - Identify Specific Risk Categories
  - Perform Detailed Analysis of Data Obtained During Identification Stage
- Should be Periodically Updated
- See Appendices J & M in Manual

# *Regulatory Change to Part 748*

- Notification of Suspicious Activity Report Filing to Board of Directors
  - “Prompt” Notification
  - Method of Notification
- Historical Review – Best Business Practice
- Provides Greater Detail for SAR Requirements

## *Top BSA Compliance Issues - 2006*

1. Independent Testing
2. Training
3. System of Internal Controls
4. BSA Compliance Program
5. CTR Form Errors / Filing Issues

## *Preparing for a BSA Review*

- ✓ Document, Document, Document
- ✓ Prioritize Issues / Track Resolution
- ✓ Think in Cycles
- ✓ Foster Communication
- ✓ Sign up for Periodic Email Alerts

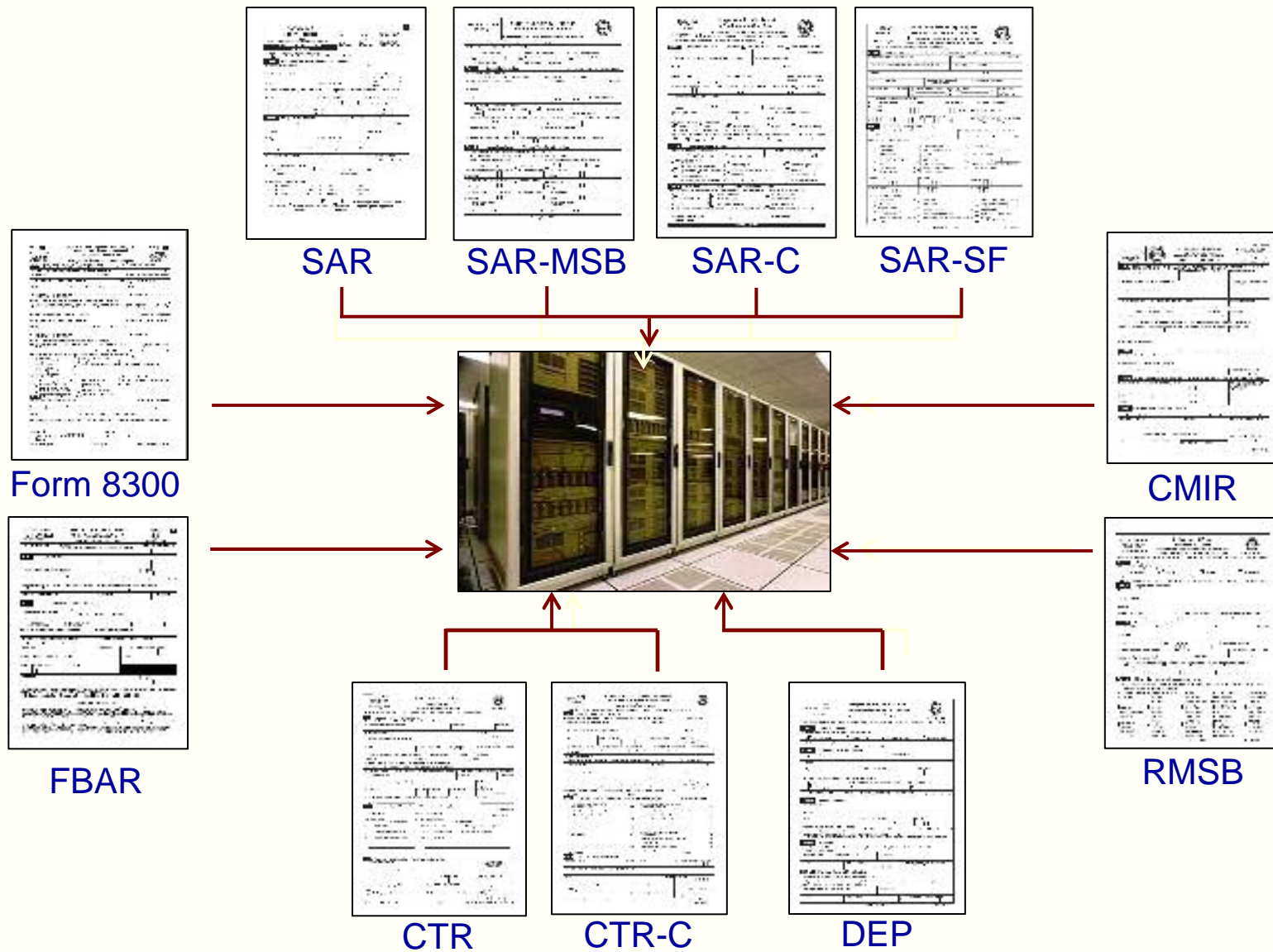


# *Setting the Table for 2007*

- FFIEC BSA/AML Manual Drafting Group
- New SAR Form to be Implemented
- Other FFIEC BSA Working Groups
- CC SME Training
- BSA Portion of NCUA Website

# **Value of Bank Secrecy Act Data in Safeguarding Our Nation's Financial Systems**





## **Law Enforcement Access**

- 235 participating agencies
- 3,900 individual users

### **Bulk Data Users:**

- Federal Bureau of Investigation
- Drug Enforcement Administration
- United States Secret Service
- Department of Homeland Security
- Immigration and Customs Enforcement

# How FinCEN Utilizes the BSA Data

In support of the investigative efforts of our law enforcement and regulatory partners

Both domestically and internationally

To conduct industry threat assessments and vulnerability studies

Mortgage Loan Fraud

Commercial Real Estate Industry Assessment

Stored value product abuse

In development of regulatory policy

Helping to uncover where new regulations may be needed



**SAR**

**2,793,233**

**1/1/1996**

**1/25/2007**

## FINCEN ENTERPRISE-WIDE ANALYTICAL SYSTEM



SARC	29,558	8/16/1996	1/23/2007
CMIR	3,181,400	2/4/1991	1/16/2007
8300	724,425	1/1/2002	1/2/2007
SFSAR	25,210	1/16/2003	1/11/2007
FBAR	2,425,072	7/12/1990	1/4/2007
SARMSB	1,404,860	10/1/2002	1/19/2007
CTRC	4,593,260	1/6/1992	1/17/2007
CTR2007	509,914	1/2/2007	1/12/2007
CTR2006	14,938,220	1/3/2006	12/29/2006
CTR2005	14,229,548	1/3/2005	12/31/2005
CTR2004	13,554,298	1/2/2004	12/31/2004
CTR2003	12,708,601	1/2/2003	12/31/2003
CTR2002	12,576,729	1/2/2002	12/31/2002

☒ Show Tips at Startup

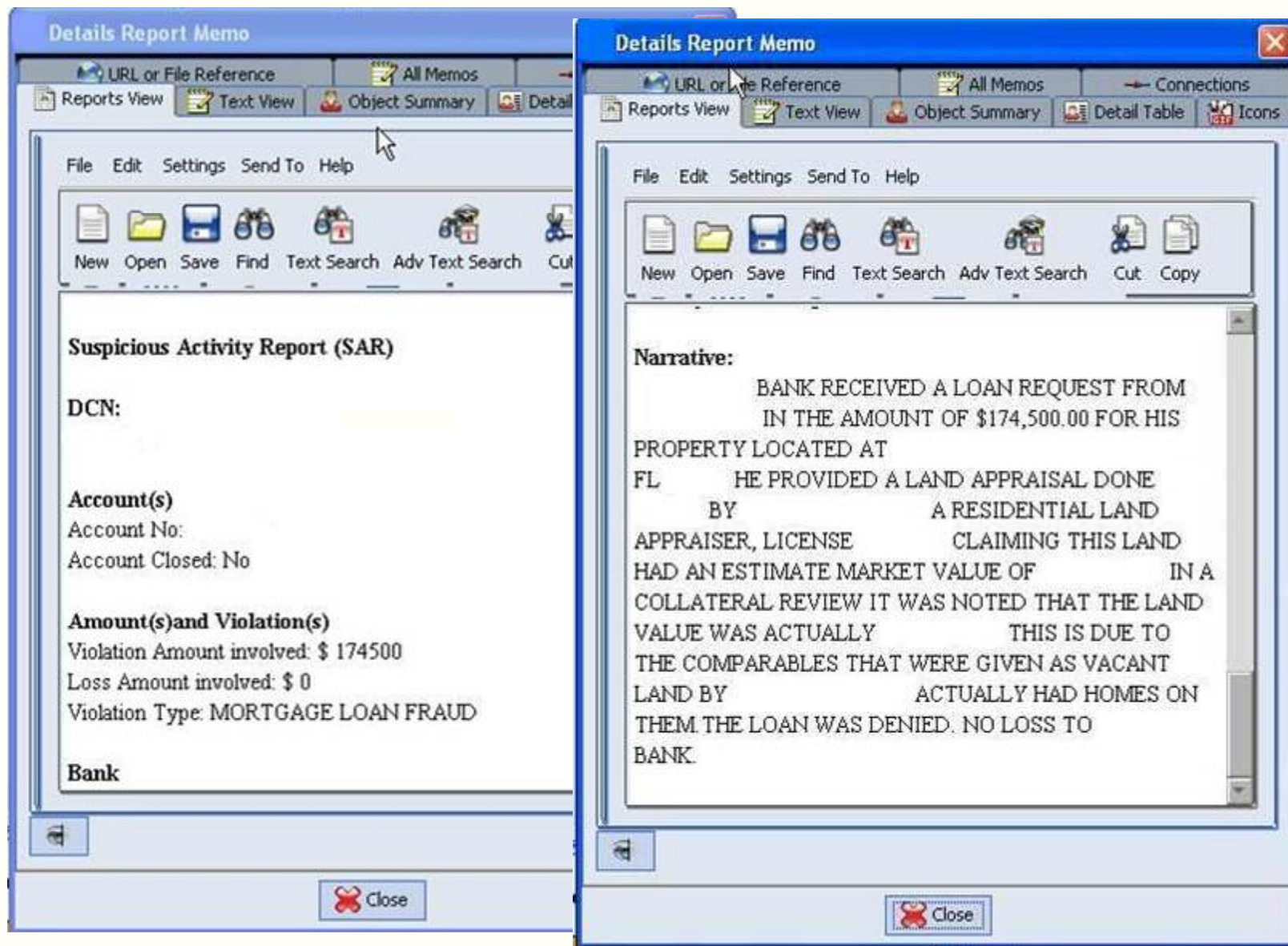
 Close

Results SUM SAR DI 1 [61 / 0]

Manage Edit View Actions Services History Undo Output

BSA-SAR- Financial Crimes Enforcement Network - Official Use Only

	 <b>MORTGAGE LOAN FRAUD</b> 11/9/2005 145000	 <b>MORTGAGE LOAN FRAUD</b> 8/21/2006 572000
	 <b>MORTGAGE LOAN FRAUD</b> 3/15/2006 224000	 <b>MORTGAGE LOAN FRAUD</b> 4/8/2005 61200



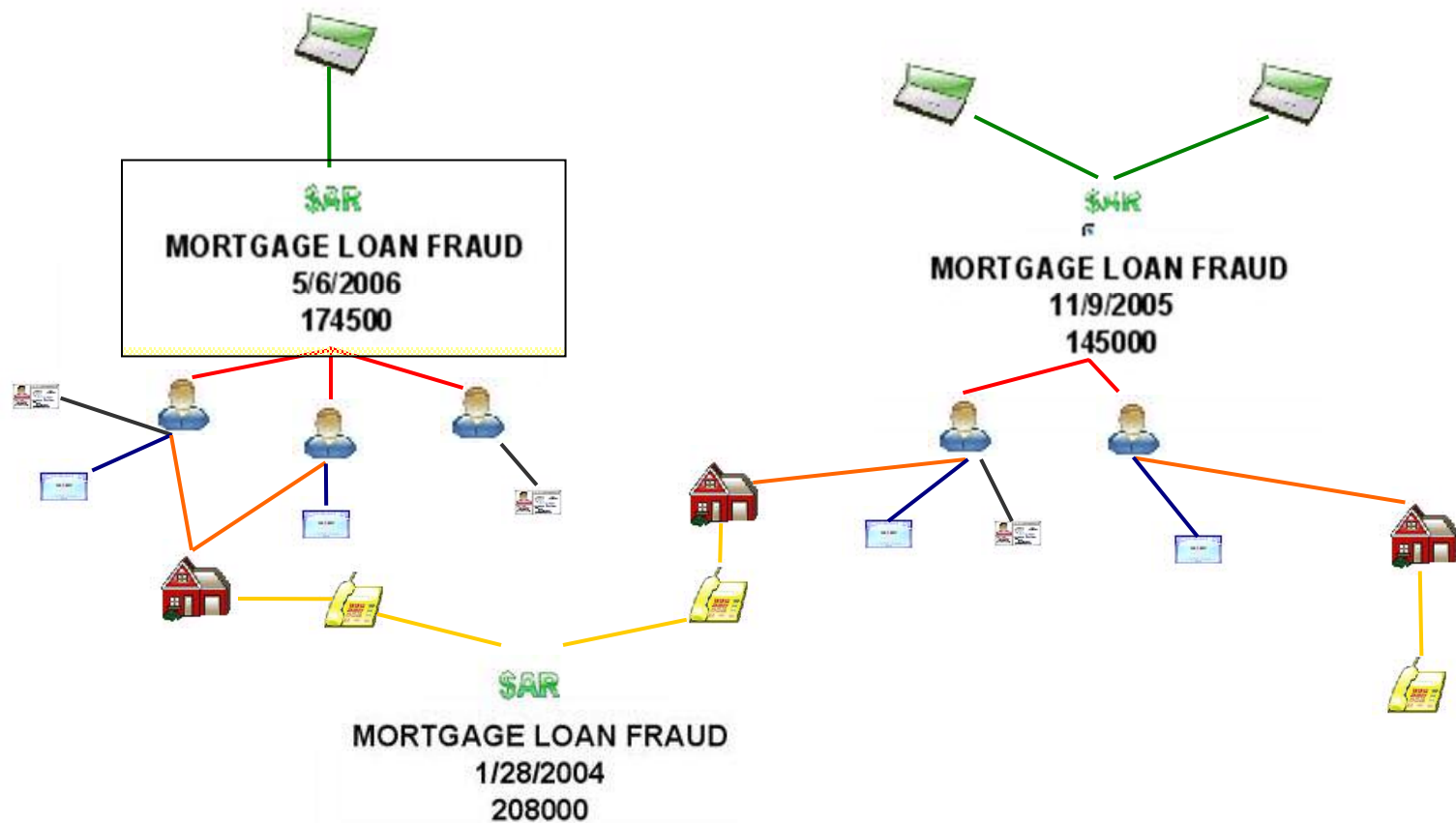


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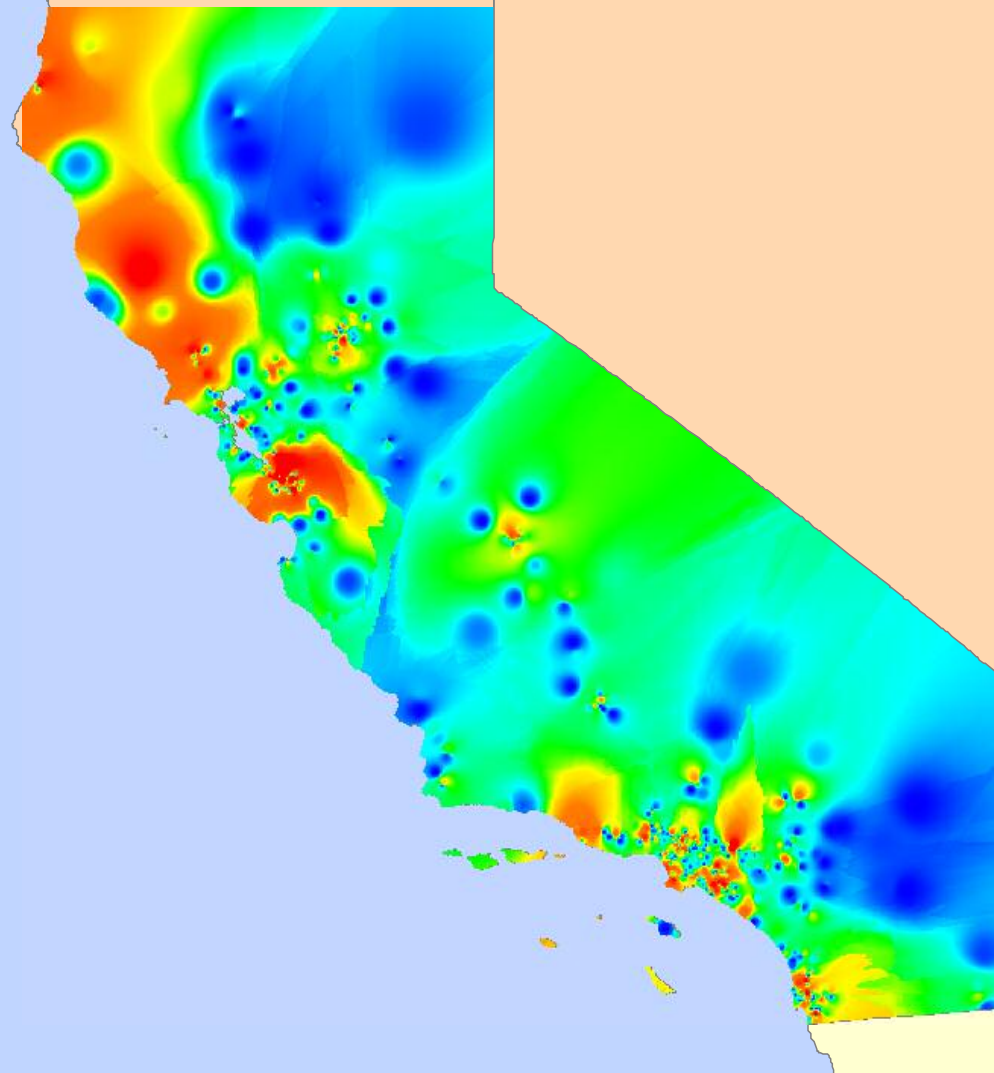
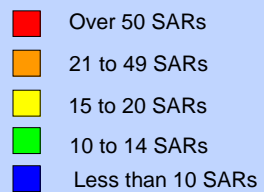
BSA-SAR- Financial Crimes Enforcement Network - Official Use Only



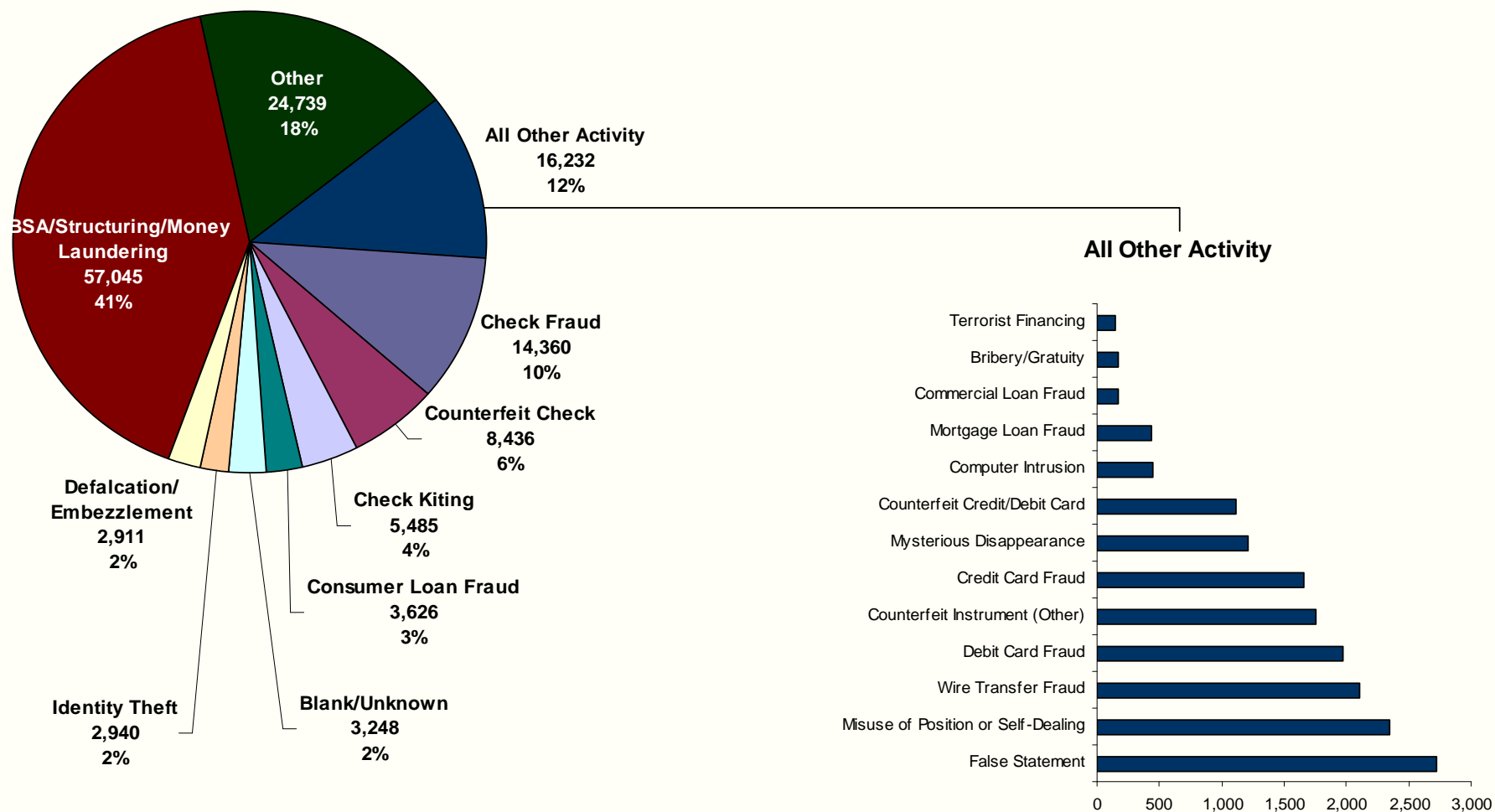
# Federally Regulated Credit Unions Suspicious Activity Report Filings for the State of California

*For the Period January 1, 2006 through December 31, 2006*

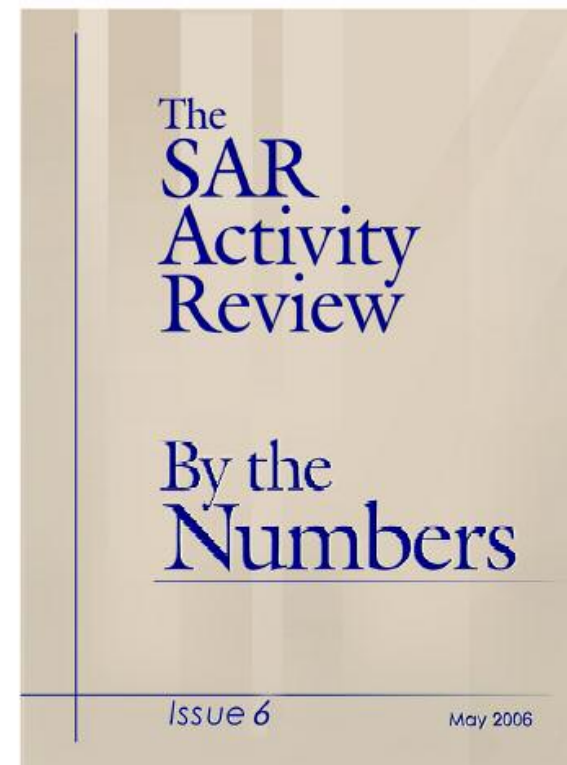
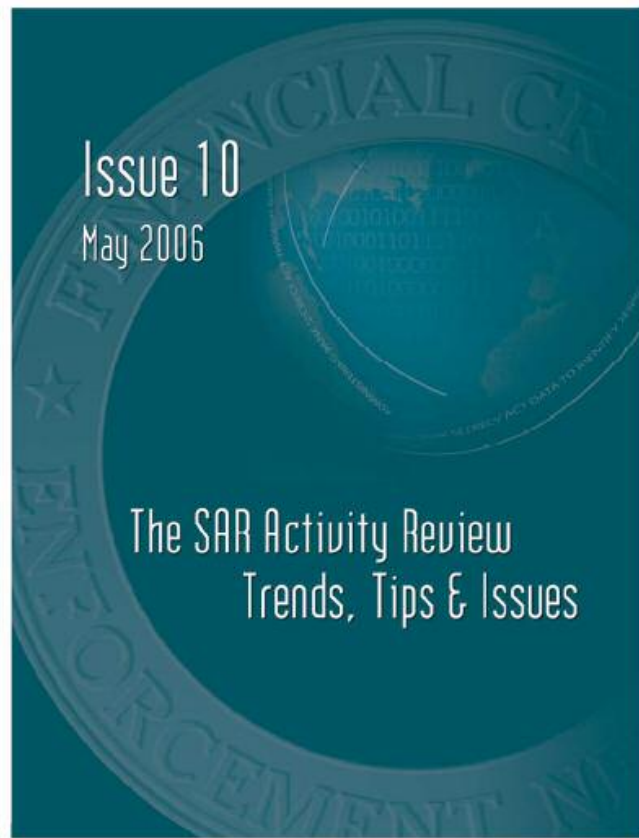
## California NCUA SAR Filings by Filer Branch Zip Code



## NCUA SAR Filings by Characterization of Suspicious Activity For the period April 1, 1996 through December 31, 2006

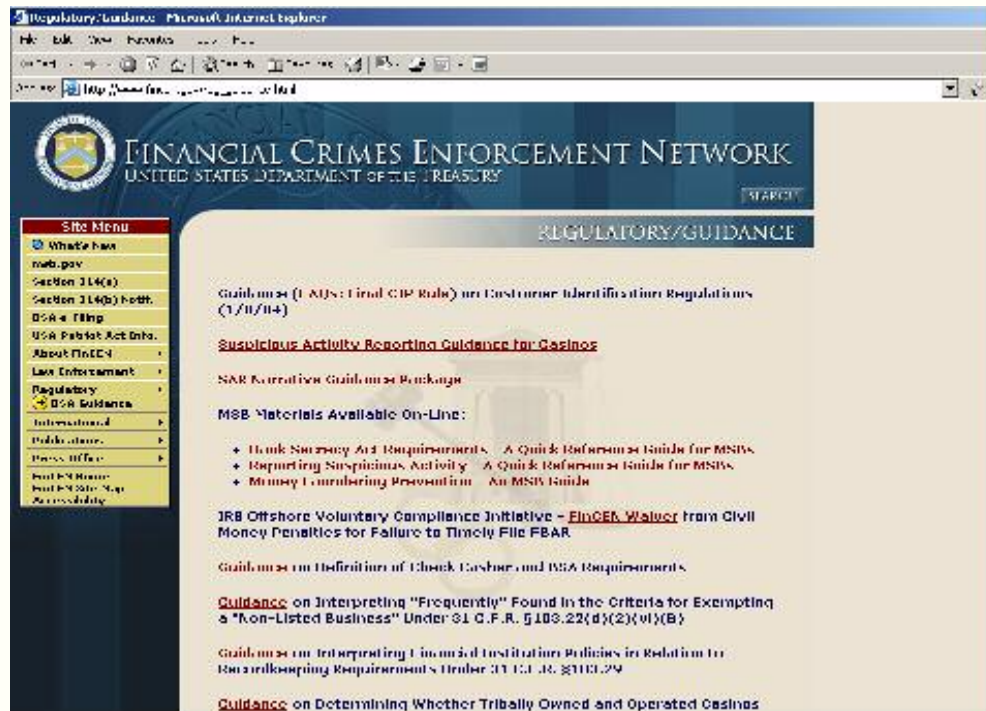


# BSA Data Used to Publish *The SAR Activity Review*





# Information and Guidance



## FinCEN's Web Site:

- Frequently Asked Questions
- Interpretive Rulings
- Industry Regulations
- Enforcement Actions
- *SAR Activity Reviews*
- National Money Laundering Strategy

# **Additional Resources**

FinCEN Regulatory Helpline

1-800-949-2732

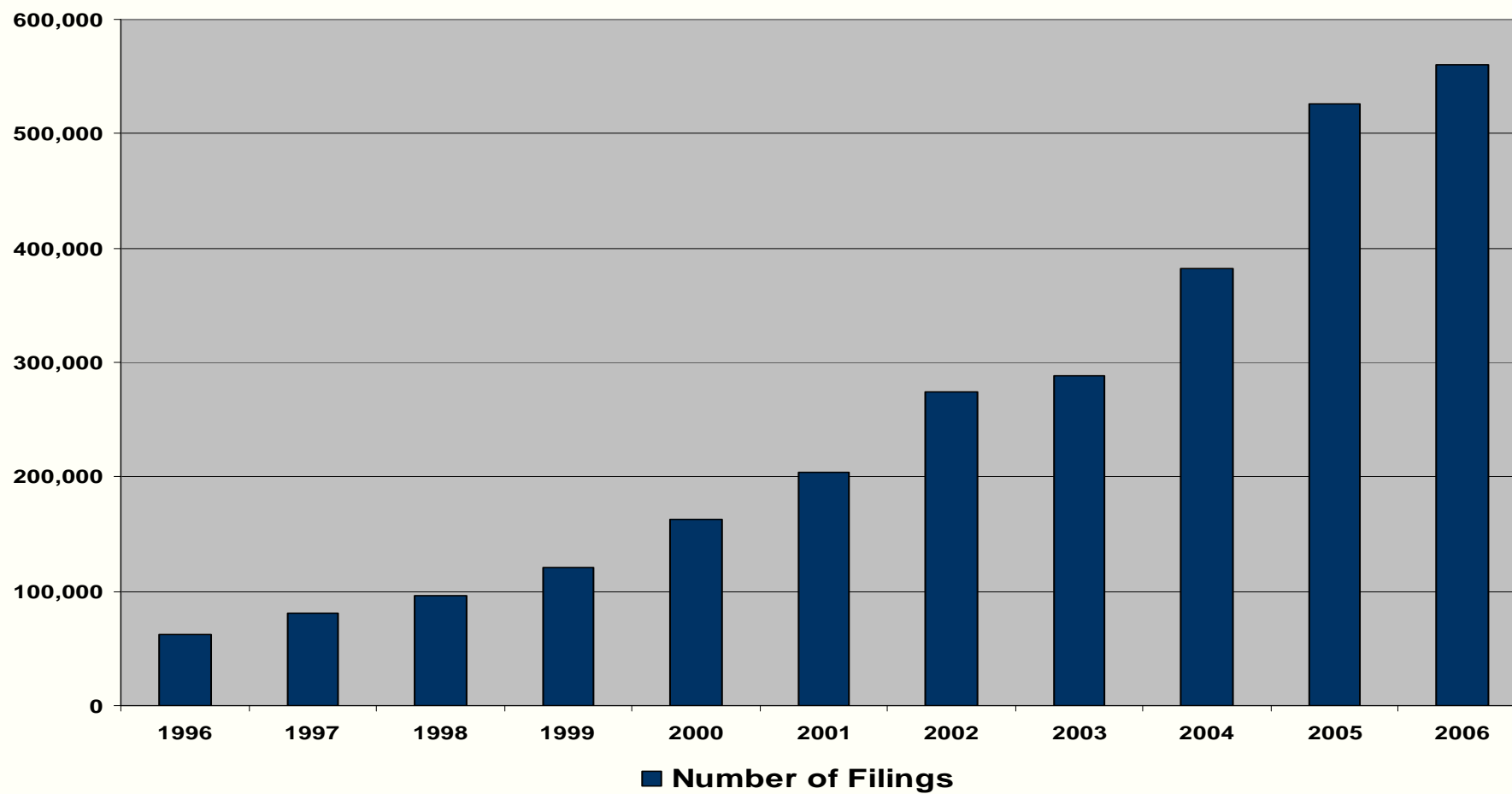
Financial Institutions Hotline\*

1-866-556-3974

\*The Financial Institutions Hotline should only be used to report suspected or known instances of recent or ongoing terrorist financing activity.

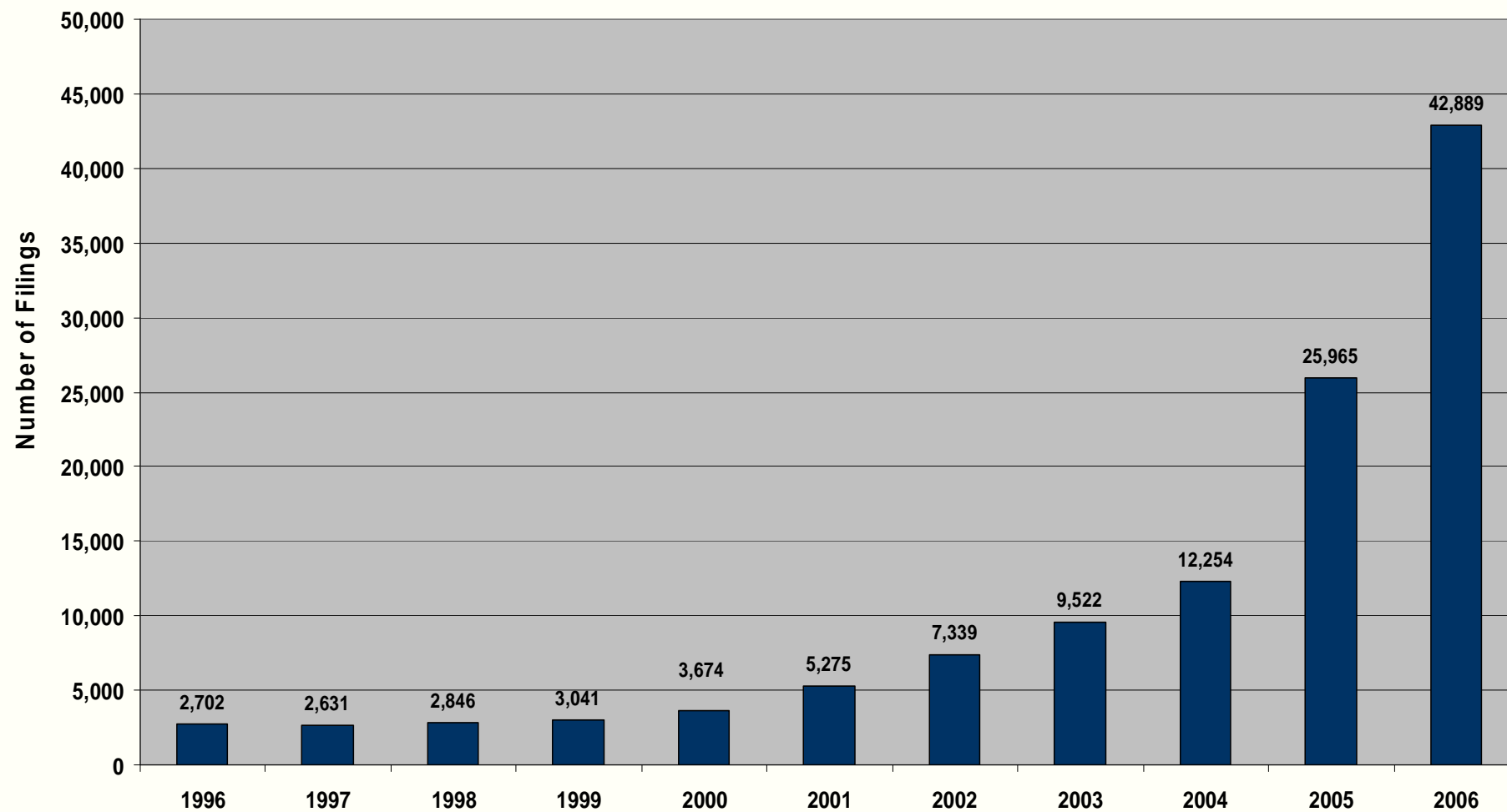
# **NCUA-Regulated Credit Unions BSA Filing Trends**

**Suspicious Activity Report Filing Trend by Depository Institutions**  
**For the period April 1, 1996 through December 31, 2006**

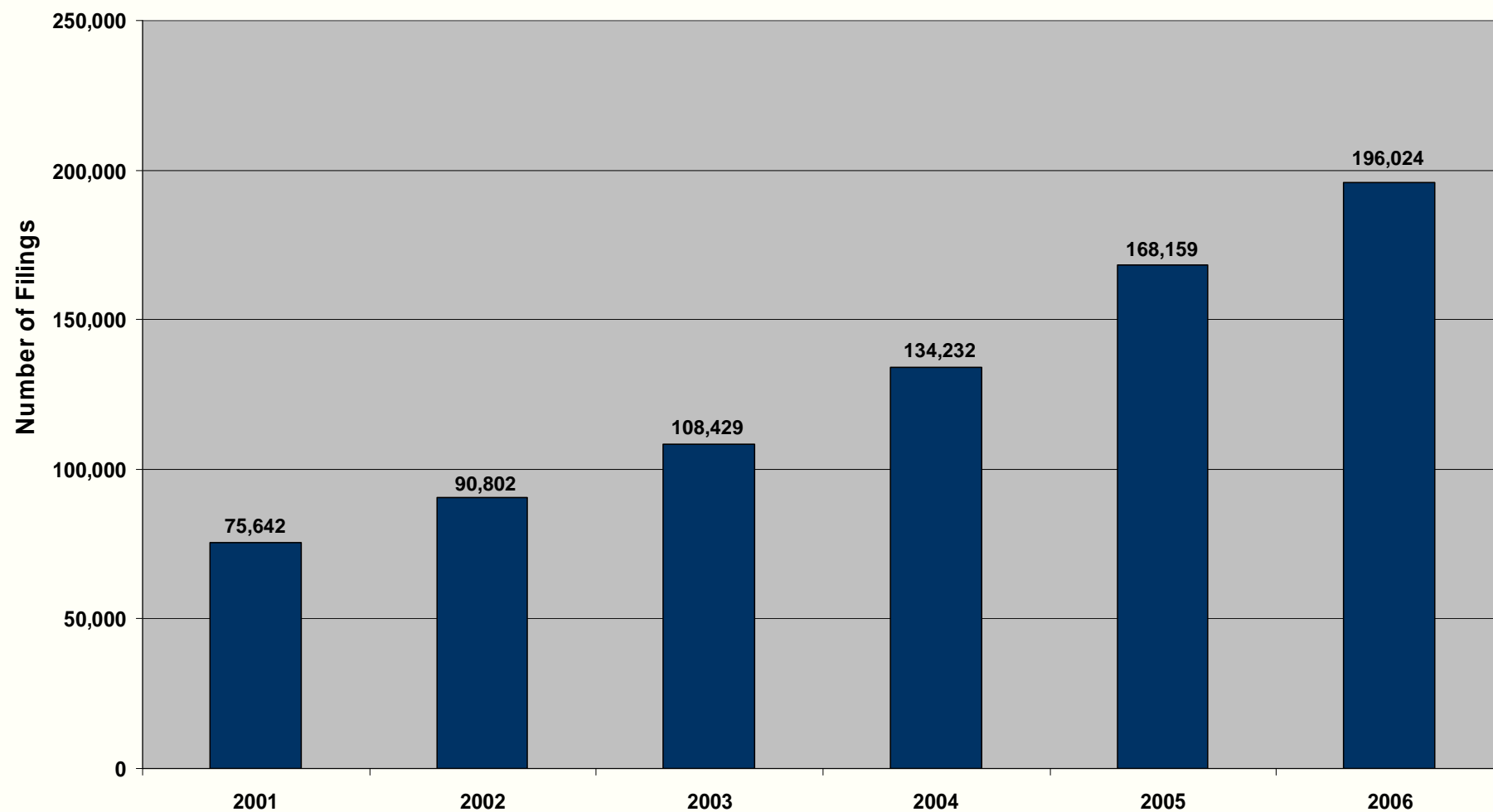




**Suspicious Activity Report Filing Trend by NCUA Regulated Credit Unions  
For the period April 1, 1996 through December 31, 2006**



**Currency Transaction Report Filing Trend by NCUA Regulated Credit Unions**  
**For the period January 1, 2001 through December 31, 2006**



**Designation of Exempt Person Filing Trend by NCUA Regulated Credit Unions**  
**For the period January 1, 2001 through December 31, 2006**

